

Echota Wolfclan

v.

Washington State DSHS  
Pierce County Council et al

Case #

Declaration

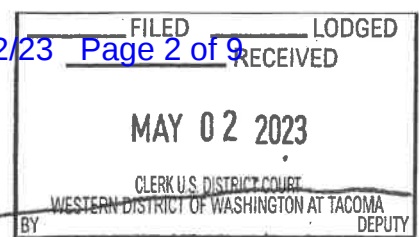
Kristopher Starkgraf

BKG# 2023059007

I been housed in Unit 3 Worth A (mental health housing) for the last 4 weeks or so, every night I am waking up with feces, urine, and possibly other toxic bodily fluids. There is a Strong Odor of all this hazardous waste splashing around the walls and surrounding floor of my cell. During the time this occurs each night, I am denied Cleaning Supplies and any ways of filing grievances about this issue at the time of need. As a result, I am forced to be exposed to the odor and hazardous biological waste for periods of over 12 hours at a time, and am told by medical staff to avoid contact with others when throwing up or having Diarrhea. When I clean my cell, I am not given any glove or eyewear or other PPE or any extra changes of clothes leaving me to contaminate my bedding when I sleep.

I declare under penalty of perjury that the above Statement is true to the best of my Knowledge.

Signed this day of April, 9<sup>th</sup>, 2023  
KRISTOPHER STARKGRAF  
Kristopher Starkgraf



Case #

Echota Wolfclan

Declaration of

Washington State DSHS

Pierce County Council et al

Carl Boyd Oberchinn

BKG# 2023057006

Feb on or around Feb 26 @W Feb 2  
26 Entern 3 MA A 16-17 Cell.

A 18 Flukes RAW Cums up IN

my Toilet. Every morning I  
have to get up to RAW

Suggeye. And Eat my Break-  
fast. Some Time Eat my LUNCH.

IN A UNCLEAN CELL. I AM Denied  
Clenning Supplis. IN Time OF

Need. COS Tell me. That

It NOT OUT ITS NOT MY

Time. OUT I Clean my toilet

BACK SPASH with toilet paper

er. They Denied me greenies

~~A~~ BLACK mold ALL over the

Shower. UNSANETARY MAKING us SICK.

I Testify and declare under Penalty of Perjury  
that the above Declaration is True to the best  
of my Belief.

Signed this 9th day of April 2023 in Pierce County Jail  
3NA

Carl D. Oberchinn

CARL Boyd Oberchinn.

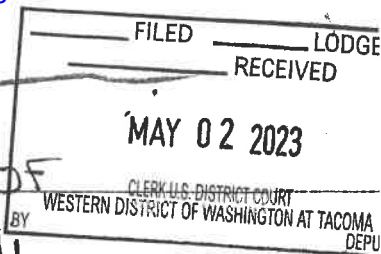
Echota Wolfclan

Washington State DSHS  
Pierce County Council et al

Case #

Declaration of  
Chris Donapoli

BK9 2023082007



around the middle of march i came in  
3NA bottom floor and flushed toilet  
and what a smell and then the next cell  
flushed toilet and it was in my toilet  
to and still smellet that was a problem sorry.  
i am Chris Donapoli in 5 cell 4-15-23.

I declare under Penalty of Perjury that  
the forgoing is True and correct.

Signed this 15<sup>th</sup> day of April 2023

Signed  
Chris Donapoli



Case #

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Echota Wolfelan

Declaration of

Troy Sevasin

Washington State DSHS

BKG # 2022331015

Pierce County Council et

When I got to SNVH8 House  
the toilet's back flushed with  
both raw sewage. It smells  
so bad some day I could not  
eat. Also got sick and had the  
runts. Got sick for 8 days  
dehydrated and had to have  
fluids. Showers my floor  
black mold and rusty paint.

Signed

Troy L. Sevasin

Under Penalty of Perjury, the foregoing  
statement is True and Correct.

Signed this 15th day of April 2023

Troy L. Sevasin

Troy L. Sevasin

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Case #

Echota Wolfclan et al  
v.Declaration of  
Elijah King

Washington State DSHS

BK9 # 2023053017

Pierce County Council et al

On or around February 23, I entered 3N13 and now I am in 3North A 24 mental health unit every time the cell next to mine flushes, bodily waste gets pushed into the toilet. Every day I wake up the toilet is full of fecal matter and other fluids in and on top of my toilet. We are denied cleaning supplies in times of need such as lockdowns and etc and are also denied gloves and PPE.

It constantly stinks of raw sewage in our unit which gives me headaches, diarrhea, also our shower vents and our wall are filled with rusted paint and what we believe to be black mold. I am a unit worker and are forced to clean urine and fecal matter and blood etc without the proper PPE.

I have been forced to go into a vacant cell with a toilet that hasn't been cleaned in over a week which caused the air to be filled with fecal matter which made me sick. All the people have been getting sick and every nurse tells us to lockdown which doesn't solve anything.

I declare that the statements are true under Penalties of Perjury. Signed April 9th 2023

Signed ELLIAN GABRIEL KING (Elijah G King)

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Echota Wolfclan  
V.

Case #  
Declaration of

Washington State DSHS Ibrahim Abdalbarri  
Pierce County Council et al 2022293015

On or Around March 2023 I entered shortly  
A Mental health housing unit. Every time the  
joining ceiling flushes the toilet raw sewage I  
bubbles up and flows into my toilet. We  
are denied cleaning supplies in times of  
need. And I've had to eat my breakfast  
with raw sewage back flowing into the  
toilet.

Are unit constantly smells like Rotten eggs  
causing me headaches and stomach aches.  
I've thrown up my meals multiple times.  
Are shower for the mental unit has black  
mold falling out of the vent and Rusty paint  
on to us while we shower.

Please Help to get Facility Refurbished.

I declare under Penalty of Perjury that  
the foregoing statement is True and Correct.

Signed this 15<sup>th</sup> day of April 2023

Ibrahim Abdalbarri





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CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA  
DEPUTY

Case #

Declaration of

Adrian Johnson

BKG # 202/302006

Echota Wolf Clan

1111V.

Washington State DSHS

Pierce County Counsel et al

On or about January 2023 I became a witness of 3 MATH A Unit  
 our unit is exposed to the smell of raw eggs but later I saw it was something  
 and could not be sick. our tablet went from black mold and rust

I declare under Penalty of Perjury that the  
 Foregoing is True and Correct.

Signed April 15<sup>th</sup> 2023

Adrian Johnson

Echota Wolfclan  
CLASS member

Washington State  
(DSHS)

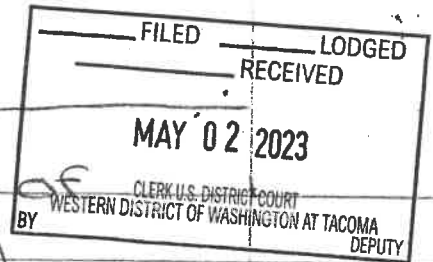
Pierce County Council  
etal

Case #

Declaration of

Tan Flannery

BK9# 2023061013



I, ~~Tan Flannery~~, Class member of Wolfclan  
v. Washington State (DSHS) et al, am under the  
Custody of Washington State "DSHS" according to  
RCW 10.77.088 and being supervised by Pierce  
County Jails Policies, Practices and Customs,  
afforded to us by Pierce County Council.

I am a Resident of the 3 North A (Mental Health  
Housing unit) cell 28.

I have an open sore on my leg, that has now  
swollen up due to the fecal, urine that has gotten  
on it twice now from our toilets inhumane condition  
of passing and over-flowing with each others  
Raw-Sewage. I had to call a Medical Emergency. My  
Anus were swollen because of the sewer  
odors, causing not only infection, but Dizziness,  
constant headaches, upset-stomach, vomiting,  
it's a Torture when I have to wake-up and  
eat my food next to a Poop stained & full toilet  
with God knows what diseases.

I declare under Penalty of Perjury  
the The above Statement is True & Correct.  
Signed April 26<sup>th</sup> 2023 @ Pierce County Jail

Tan Flannery



MAY 02 2023

CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA  
DEPUTY

Class members

✓

Washington State DSHS  
Pierce County Council et al

Case #

Declaration of

Daniel Clark

BKG# 2022084006

I, Daniel Clark, Class Member of Wolfclap v. Washington State D.S.H.S., am a Resident of 3NA Mental Health Housing Unit. The toilets in this unit are unclean, each one back-flushes Raw Sewage, in which causes bubble-ups and splashes of nasty Poop in each other's Cell. Every morning, I wake up to shit in my toilet every morning, being forced to eat next to a smelly unsanitary toilet... Also, Our unit produces the most Nauseous, Gasey odors, leaving us to constantly in-hale Sewage particles. I have constant headaches, upset stomach's, throw-up and at times I can't even eat. My Mental Health is at a Low, constantly depressed at how we are being Treated.

My old Cell-Mate, Chris Dinopali, Spoke of hanging himself because the Smell/odor, he then 4/23/2023, told officers that it Smelt so bad, and that he didn't feel safe. He was Put in the hole.

We are being Treated Worse than General Population.

I declare under Penalty of Perjury that the above Declaration is True & Correct

Signed April 26<sup>th</sup> 2023 @ Pierce County Jail

Daniel Clark Jr.

Daniel Clark Jr.